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22 DREW KLAUSNER

23 UNITED STATES DISTRICT COURT  
24 NORTHERN DISTRICT OF CALIFORNIA  
25 OAKLAND DIVISION

26 DREW KLAUSNER;

27 Plaintiff,

28 v.

INDUSTRIAL LIGHT AND MAGIC, a  
division of LUCASFILM ENTERTAINMENT  
COMPANY LTD. and DOES 1 through 25,  
inclusive,

Defendants.

Case No. CV 09-03502-CW

**STIPULATION & ORDER EXTENDING  
EXPERT WITNESS DEADLINES;  
DECLARATION OF ROBERT M. LIEBER**

**[Fed. R. Civ. Proc. 29; Civ. L.R. 6-2]**

Action Filed: July 30, 2009  
Trial Date: April 11, 2011

**STIPULATION OF THE PARTIES**

WHEREAS, the deadline to disclose the identities and reports of expert witnesses in this case is currently October 29, 2010, and the deadline to complete expert discovery is December 1, 2010;

WHEREAS, the trial of this action is not scheduled to begin until April 11, 2011;

WHEREAS, Defendant's motion for summary judgment was heard on September 16, 2010, and is currently pending;

WHEREAS, the Parties have agreed to participate in a mediation on December 6, 2010 to determine if settlement of this case is possible;

WHEREAS, the Parties desire to prevent unnecessary expenditures of expert fees pending the mediation and the order on Defendant's motion for summary judgment;

WHEREAS, continuing the expert discovery deadlines will not delay the trial date or otherwise affect the schedule for this case;

THEREFORE, pursuant to Federal Rule of Civil Procedure 29 and Civil Local Rule 6-2, the Parties to this action, by and through their counsel of record, do HEREBY STIPULATE AND REQUEST THE COURT TO ORDER as follows:

(1) The deadline to disclose the identities and reports of expert witnesses is extended from October 29, 2010 to December 17, 2010; and

(2) The deadline to complete expert discovery is extended from December 1, 2010 to January 28, 2010.

IT IS SO STIPULATED.

DATED: October 27, 2010

MARGOLIS & TISMAN LLP

By: /s/ Robert M. Lieber  
ROBERT M. LIEBER

Attorneys for Defendant  
INDUSTRIAL LIGHT AND MAGIC, a  
division of LUCASFILM ENTERTAINMENT  
COMPANY LTD.

1  
2 DATED: October 28, 2010

PIERCE & SHEARER LLP

3 By: /s/ Stacy North  
4 STACY NORTH

5 Attorneys for Plaintiff  
6 DREW KLAUSNER


7 **ORDER**

8  
9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

10 (1) The deadline to disclose the identities and reports of expert witnesses is extended from  
11 October 29, 2010 to December 17, 2010; and

12 (2) The deadline to complete expert discovery is extended from December 1, 2010 to  
13 January 28, 2010.

14  
15 DATED: November 1, 2010

16   
17 HON. CLAUDIA WILKEN  
18 United States District Court Judge  
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**DECLARATION OF ROBERT M. LIEBER**

I, Robert M. Lieber, hereby declare and state as follows:

1. I have personal knowledge of the facts set forth below.

2. I am a partner with Margolis & Tisman LLP, which is counsel of record in this action for Defendant Industrial Light & Magic, a division of Lucasfilm Entertainment Company Ltd. ("Defendant"). Pursuant to Civil Local Rule 6-2(a), I make this declaration to accompany the parties' stipulated request for an order extending the expert witness deadlines in this case.

3. The reason for the requested enlargement of time is to prevent unnecessary expenditures of expert fees pending mediation of this case and the order on Defendant's motion for summary judgment.

4. The only prior time modifications in this case have related to fact and expert discovery deadlines.

5. The requested time modification will not delay the trial, which is not scheduled to begin until April 11, 2010, or otherwise affect the schedule for this case.

I declare, under penalty of perjury, under the laws of the United States, that the foregoing is true and correct, and that this declaration was executed this 28th day of October, 2010, at San Francisco, California.

/s/ Robert M. Lieber  
ROBERT M. LIEBER